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REMARKS

The above-identified application has been carefully reconsidered in view of the Office Action mailed August 11, 1998, and the references cited therein. Early and favorable reconsideration and allowance of the application are respectfully requested.

The Examiner's careful reading of the application and helpful suggestions as to the correction of typographical and other, similar errors are noted with appreciation. The present amendments are intended to capture the spirit, if not the exact letter, of the suggestions made by the Examiner. Should the Examiner wish to suggest further corrections, the courtesy of a telephone interview is requested. The Examiner may contact the undersigned attorney for applicant at (214) 999-4681.

Two of the Examiner's suggestions require special comment. First, applicant respectfully declines the Examiner's requirement to change the word "pumpskid" to "pump skid". In this regard, the Examiner is respectfully reminded that applicant is entitled to be its own lexicographer. Certainly there can be no suggestion that the choice by applicant to denominate the invention with a compound word instead of two words could lead to mistake or confusion. The requirement by the Examiner for the use of "pump skid" in lieu of "pumpskid" is therefore respectfully traversed.

As to the inclusion of the reference numeral "302" in Figure 11, applicant makes two alternative suggestions. Enclosed herewith is a fresh copy of Figure 11 with the reference numeral 302 omitted. Substitution of the enclosed copy of Figure 11 for the copy thereof originally submitted with the application is respectfully requested. Alternatively, applicant suggests the inclusion of the following sentence on page 4 after

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"docking posts 384." --The ROV 300 is provided with an umbilical cord 302 which is used to provide operating power and control signals from the surface.-- In this regard, it is respectfully pointed out that, as is made clear in the specification, the ROV 300 is a commercially available product which is purchased by applicant with the umbilical cord thereof as a component part.

The rejection of Claims 1 through 4 as unpatentable under 35 U.S.C. § 103 over the Westra Patent in view of the Ahlstone Patent is respectfully traversed. It is respectfully submitted that applicant's pumpskid as disclosed in the specification and claimed in Claim 1 is in no way anticipated or rendered obvious by either of the references relied upon by the Examiner, regardless of whether the references are considered singularly or in combination.

Claim 1 specifically recites a pump having an inlet and an outlet; piping including a male connector which connects the piping to the interior of a suction anchor and an opening which connects the piping to the surrounding sea; and valving apparatus which alternatively connects the inlet of the pump to the interior of the suction anchor through the male connector and the outlet of the pump to the surrounding sea through the outlet in the piping, or connects the inlet of the pump to the surrounding sea and the outlet of the pump to the interior of the suction anchor through the male connector. No such alternative connection apparatus is disclosed or even remotely suggested in either of the references relied upon by the Examiner.

The Westra Patent discloses the use of a pump 16 which pumps water out of the interior of a suction anchor, nothing more. No valve is utilized in conjunction with

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pump 16. The Westra Patent further discloses a pump 21 which is used to pump sea water into the interior of the suction anchor. A valve 23 is utilized in conjunction with the motor 21. However, the valve 23 performs the single function of opening or closing the inlet of pump 21. The valve 23 does not function to selectively connect the inlet of pump 21 either to the interior of the suction anchor or to the surrounding sea as is specifically recited in Claim 1.


The finding by the Examiner that the Ahlstone Patent anticipates the male connector of applicant's invention as defined in Claim 1 is respectfully traversed. The connector 10 of the Ahlstone Patent connects hydraulic fluid supplied from the surface to an apparatus requiring hydraulic fluid for its operation. It does not function to direct water into and out of a suction anchor as is specifically recited in Claim 1. Thus, the Ahlstone Patent adds nothing whatsoever to the Westra Patent insofar as any possible anticipation or obviousness of applicant's claimed invention is concerned. To the contrary, the logical result of combining Ahlstone with Westra would be the use of Ahlstone's connector to supply hydraulic power to Westra for operating the pumps 16 and 21 and the valve 23.

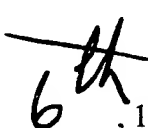
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For the reasons pointed out above, it is respectfully submitted that the application as now presented is in condition for favorable action and allowance. Withdrawal of the rejection of Claim 1 and the claims dependent therefrom, and the issuance of a Notice of Allowance in the application are therefore respectfully requested.

Respectfully submitted,

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